Mr. John E. Kieling, Chief  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6303

Subject: Carlsbad Field Office Monthly Summarization Report for Site-Generated Nonconformance Reports, July 2016

Dear Mr. Kieling:

Enclosed is the Carlsbad Field Office (CBFO) Monthly Summarization Report for Site-Generated Nonconformance Reports (NCRs), transmitted pursuant to the requirements contained in the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP), Attachment C3, Paragraph C3-7, Nonconformance to DQOs. The report lists Site-Generated NCRs received at the CBFO during the period of July 1-31, 2016.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

If you have questions or concerns, please contact Mr. Michael R. Brown, Director, CBFO Office of Quality Assurance, at (575) 234-7476.

Sincerely,

[Signature]

Todd Shrader, Manager  
Carlsbad Field Office

Enclosure

cc: w/enclosure  
T. Shrader, CBFO  *ED  
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M. Brown, CBFO  ED  
R. Maestas, NMED  ED  
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CBFO QA File  
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*ED denotes electronic distribution
Mr. John E. Kieling

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* ED denotes electronic distribution
MONTHLY SUMMARIZATION REPORT

FOR

SITE-GENERATED NONCONFORMANCE REPORTS

July 2016

This summary is submitted pursuant to the requirements of the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Attachment C3, Paragraph C3-7, Nonconformance to DQOs.

During the period of July 1 through July 31, 2016, the Carlsbad Field Office received one reportable nonconformance report, generated by the Idaho National Laboratory/Central Characterization Project (CCP).
<table>
<thead>
<tr>
<th>NCR Number</th>
<th>Responsible Organization</th>
<th>Data Identified</th>
<th>Data Received</th>
<th>Data Closed</th>
<th>Deficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>NCR-RHINL-0210-16, Rev. 0</td>
<td>Idaho National Laboratory / CCP</td>
<td></td>
<td></td>
<td></td>
<td>Batch Data Report #1: INLRHRTR16007</td>
</tr>
</tbody>
</table>

Containers 045B (Replicate Scan), 045D (Independent Observation), 045B, and 028B had absorbents listed that were assigned Other Inorganic (OI) waste material parameter in Section 3 of the associated Attachment 2s. Per the CCP-AK-INL-620, rev 1, only organic absorbents should have been used for this waste stream. The containers listed in block 3 are S3000 containers. The estimated total weights of debris for these containers were not entered into the comment field of the associated Attachment 2s; including the Independent Observation of 045D.

**Requirement Violated:**
CCP-TP-508, Rev. 11, 4.3.2 [E]. Scan the waste container, record a running commentary of the waste container contents, AND record the contents on Section 3, Waste Container Inventory and Comments, of Attachment 2. CCP-TP-508, Rev. 11, 4.3.2 [F]. IF the waste stream is S3000 or S4000 waste that also contains debris, THEN visually estimate the total weight of debris in the container of waste AND record it in the comment field of Attachment 2.

**Actions:**
DGL to correct the Other Inorganic (OI) WMP to Organic (OR) WMP for containers with (OI) absorbents listed on the corresponding Attachment 2s and re-sign (Block 7c. Actual Condition #1). DGL to add comments to Attachment 2s for all S3000 containers and re-sign (Block 7c. Actual Condition #2). DGL to add NCR to the BDR. DGL to revise Attachment 5. ITR review corrections. ITR to update, add NCR information, and re-sign Attachment 3. Submit corrections to CCP Records. SPM to add corrections to the BDR.

**Comments:**
None

**Number of items on this report:** 1